

KMD:da (Our File No.: 21-18-010-15E)

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

-----X  
MARISSA HOECHSTETTER, JANE DOE #8, JANE  
DOE #9, JANE DOE #10, JANE DOE #11, JANE DOE #12,  
JANE DOE #13, JANE DOE #14, JANE DOE #15, JANE  
DOE #16, JANE DOE #17, JANE DOE #18, JANE DOE #19,  
JANE DOE #21, JANE DOE #22, JANE DOE #23, JANE  
DOE #26, JANE DOE #27, JANE DOE #28 AND JANE DOE  
#30,

**Index No.: 161335/2018**

**VERIFIED ANSWER TO THE  
AMENDED COMPLAINT**

Plaintiffs,

-against-

COLUMBIA UNIVERSITY; THE NEW YORK AND  
PRESBYTERIAN HOSPITAL; COLUMBIA  
PRESBYTERIAN MEDICAL CENTER; COLUMBIA  
UNIVERSITY MEDICAL CENTER; COLUMBIA-  
PRESBYTERIAN MEDICAL CENTER, EAST SIDE  
ASSOCIATES; EAST SIDE ASSOCIATES; ROBERT  
HADDEN; THE TRUSTEES OF COLUMBIA UNIVERSITY  
IN THE CITY OF NEW YORK; COLUMBIA UNIVERSITY  
COLLEGE OF PHYSICIANS AND SURGEONS;  
PRESBYTERIAN HOSPITAL PHYSICIAN SERVICES  
ORGANIZATIONS, INC.; COLUMBIA-CORNELL CARE,  
LLC; COLUMBIA CORNELL NETWORK PHYSICIANS,  
INC.; SLOANE HOSPITAL FOR WOMEN,

Defendants.

-----X  
Defendant, ROBERT HADDEN, by his attorneys, VASLAS LEPOWSKY HAUSS &  
DANKE LLP, as and for his Amended Verified Answer to Plaintiff's Amended Verified  
Complaint, respectfully shows to this Court and alleges:

**PLAINTIFF MARISSA HOECHSTETTER**

1. Denies each and every allegation contained in paragraphs "1", "2", "3", "4", "5",  
"6", "7", "9" and "10".

2. Denies each and every allegation contained in paragraph “8” except admits that prior hereto ROBERT HADDEN pleaded guilty in Criminal Court to two charges.

**JANE DOE #8**

3. Denies each and every allegation contained in paragraphs “11”, “12”, “13”, “14”, “15”, “16”, “17”, “19” and “20”.

4. Denies each and every allegation contained in paragraph “18”, except admits that prior hereto ROBERT HADDEN pleaded guilty in Criminal Court to two charges.

**JANE DOE #9**

5. Denies each and every allegation contained in paragraphs “21”, “22”, “23”, “24”, “25”, “26”, “28” and “29”.

6. Denies each and every allegation contained in paragraph “27”, except admits that prior hereto ROBERT HADDEN pleaded guilty in Criminal Court to two charges.

**JANE DOE #10**

7. Denies each and every allegation contained in paragraphs “30”, “31”, “32”, “33”, “34”, “35”, “36” and “38”.

8. Denies each and every allegation contained in paragraph “37”, except admits that prior hereto ROBERT HADDEN pleaded guilty in Criminal Court to two charges.

**JANE DOE #11**

9. Denies each and every allegation contained in paragraphs “39”, “40”, “41”, “42” and “43”.

**JANE DOE #12**

10. Denies each and every allegation contained in paragraphs “44”, “45”, “46”, “47”, “48”, “49”, “51” and “52”.

11. Denies each and every allegation contained in paragraph "50", except admits that prior hereto ROBERT HADDEN pleaded guilty in Criminal Court to two charges.

**JANE DOE #13**

12. Denies each and every allegation contained in paragraphs "53", "54", "55", "56", "57", "58", "60" and "62".

13. Denies each and every allegation contained in paragraph "59", except admits that prior hereto ROBERT HADDEN pleaded guilty in Criminal Court to two charges.

14. Denies any knowledge or information sufficient to form a belief as to each and every allegation contained in paragraph "61".

**JANE DOE #14**

15. Denies each and every allegation contained in paragraphs "63", "64", "65", "66", "67", "68", "69", "70", "71", "72", "74" and "75".

16. Denies each and every allegation contained in paragraph "73", except admits that prior hereto ROBERT HADDEN pleaded guilty in Criminal Court to two charges.

**JANE DOE #15**

17. Denies each and every allegation contained in paragraphs "76", "77", "78", "79", "80", "81", "82", "83", "84", "86" and "87".

18. Denies each and every allegation contained in paragraph "85", except admits that prior hereto ROBERT HADDEN pleaded guilty in Criminal Court to two charges.

**JANE DOE #16**

19. Denies each and every allegation contained in paragraphs "88", "89", "90", "91", "92", "93", "94", "95", "97" and "98".

20. Denies each and every allegation contained in paragraph “96”, except admits that prior hereto ROBERT HADDEN pleaded guilty in Criminal Court to two charges.

**JANE DOE #17**

21. Denies each and every allegation contained in paragraphs “99”, “100”, “101”, “102”, “103”, “104”, “105”, “106”, “108” and “109”.

22. Denies each and every allegation contained in paragraph “107”, except admits that prior hereto ROBERT HADDEN pleaded guilty in Criminal Court to two charges.

**JANE DOE #18**

23. Denies each and every allegation contained in paragraphs “110”, “111”, “112”, “113”, “114”, “115”, “116”, “117”, “118”, “119”, “120”, “121”, “122”, “123”, “124”, “125”, “126”, “127”, “128”, “129”, “130”, “131”, “133” and “134”.

24. Denies each and every allegation contained in paragraph “132”, except admits that prior hereto ROBERT HADDEN pleaded guilty in Criminal Court to two charges.

**JANE DOE #19**

25. Denies each and every allegation contained in paragraphs “135”, “136”, “137”, “138”, “139”, “140”, “141”, “142”, “144”, “145” and “146”.

26. Denies each and every allegation contained in paragraph “143”, except admits that prior hereto ROBERT HADDEN pleaded guilty in Criminal Court to two charges.

**JANE DOE #21**

27. Denies each and every allegation contained in paragraphs “147”, “148”, “149”, “150”, “151”, “152”, “153”, “155” and “156”.

28. Denies each and every allegation contained in paragraph “154”, except admits that prior hereto ROBERT HADDEN pleaded guilty in Criminal Court to two charges.

**JANE DOE #22**

29. Denies each and every allegation contained in paragraphs “157”, “158”, “159”, “160”, “161”, “162” and “164”.

30. Denies each and every allegation contained in paragraph “163”, except admits that prior hereto ROBERT HADDEN pleaded guilty in Criminal Court to two charges.

**JANE DOE #23**

31. Denies each and every allegation contained in paragraphs “165”, “166”, “167”, “168”, “169”, “170”, “171”, “172”, “173”, “174”, “176” and “177”.

32. Denies each and every allegation contained in paragraph “175”, except admits that prior hereto ROBERT HADDEN pleaded guilty in Criminal Court to two charges.

**JANE DOE #26**

33. Denies each and every allegation contained in paragraphs “178”, “179”, “180”, “181”, “182”, “183”, “184”, “185”, “186” and “187”.

**JANE DOE #27**

34. Denies each and every allegation contained in paragraphs “188”, “189”, “190”, “191”, “192”, “193”, “194” and “195”.

**JANE DOE #28**

35. Denies each and every allegation contained in paragraphs “196”, “197”, “198”, “199”, “200”, “201”, “202”, “203”, “204”, “205”, “206” and “207”.

**JANE DOE #30**

36. Denies each and every allegation contained in paragraphs “208”, “209”, “210”, “211”, “212”, “213”, “214”, “215”, “216”, “217”, “218”, “219”, “220”, “221”, “222”, “223” and “225”.

37. Denies any knowledge or information sufficient to form a belief as to each and every allegation contained in paragraphs "224".

**DEFENDANT ROBERT HADDEN**

38. Denies each and every allegation contained in paragraph "226", except admits that ROBERT HADDEN is an adult male, who lives in the State of New Jersey, received his medical degree from the New York Medical College in 1987 and completed his medical internship and residency in Obstetrics and Gynecology and thereafter practiced as an obstetrician/gynecologist at various facilities.

39. Denies any knowledge or information sufficient to form a belief as to each and every allegation contained in paragraph "229" and all questions of law are reserved for the Court.

40. Denies each and every allegation contained in paragraphs "227", "228", "230" and "231".

**DEFENDANTS COLUMBIA UNIVERSITY; THE NEW YORK AND PRESBYTERIAN HOSPITAL; COLUMBIA PRESBYTERIAN MEDICAL CENTER; COLUMBIA UNIVERSITY MEDICAL CENTER; COLUMBIA-PRESBYTERIAN MEDICAL CENTER, EAST SIDE ASSOCIATES; EAST SIDE ASSOCIATES; THE TRUSTEES OF COLUMBIA UNIVERSITY IN THE CITY OF NEW YORK; COLUMBIA UNIVERSITY COLLEGE OF PHYSICIANS AND SURGEONS; PRESBYTERIAN HOSPITAL PHYSICIAN SERVICES ORGANIZATIONS, INC.; COLUMBIA-CORNELL CARE, LLC; and COLUMBIA CORNELL NETWORK PHYSICIANS, INC. (CORP. ENTITIES)**

41. Denies any knowledge or information sufficient to form a belief as to each and every allegation contained in paragraphs "232", "234", "235", "236", "237", "238", "239", "240", "241", "242", "243", "244", "245", "246", "247", "248", "249", "250", "251", "252", "253", "254", "255", "270", "271", "272", "273", "274", "275", "276", "277", "278", "279", "280", "281", "282", "283", "284", "285", "286", "287", "288", "289", "290", "291", "292", "293", "294", "295", "296", "297", "298", "299", "300", "301", "302", "303", "304", "305", "306", "307", "308", "309", "310", "311", "312", "313", "314", "315", "316", "317", "318", "346", "347", "379",

“404”, “424”, “425”, “426”, “427”, “428”, “429”, “430”, “431”, “432”, “433”, “434”, “436”, “437”, “438”, “439”, “440”, “441”, “442”, “443”, “444”, “445”, “446”, “447”, “454”, “455”, “468”, “470”, “471” and “472”.

42. Denies each and every allegation contained in paragraphs “233”, “256”, “322”, “323”, “324”, “325”, “326”, “327”, “328”, “329”, “330”, “331”, “332”, “333”, “334”, “335”, “336”, “337”, “338”, “339”, “340”, “341”, “342”, “343”, “344”, “345”, “348”, “349”, “350”, “351”, “352”, “353”, “354”, “355”, “356”, “357”, “358”, “359”, “360”, “361”, “362”, “363”, “364”, “365”, “366”, “367”, “373”, “374”, “375”, “376”, “377”, “378”, “380”, “381”, “382”, “383”, “384”, “385”, “386”, “387”, “388”, “389”, “390”, “391”, “392”, “393”, “394”, “395”, “405”, “406”, “407”, “408”, “411”, “412”, “413”, “414”, “415”, “416”, “417”, “418”, “419”, “420”, “421”, “422”, “423”, “435”, “448”, “449”, “450”, “451”, “452”, “453”, “456”, “457”, “458”, “459”, “460”, “461”, “462”, “463”, “464”, “465”, “466”, “467”, “469”, “473”, “475”, “476”, “477”, “478” and “479”.

43. Admits the allegations contained in paragraphs “257” and “319”.

44. Denies any knowledge or information sufficient to form a belief as to each and every allegation contained in paragraphs “320”, “321”, “368”, “369”, “370”, “371”, “372” and “474” and all questions of law are reserved for the Court.

45. Denies each and every allegation contained in paragraphs “396”, “397”, “398”, “399”, “400”, “401”, “402”, “403”, “409”, “410”, except admits that prior hereto ROBERT HADDEN pleaded guilty in Criminal Court to two charges.

**FACTUAL ALLEGATIONS APPLICABLE TO ALL CLAIMS BY ALL PLAINTIFFS**

46. Denies each and every allegation contained in paragraphs “480”, “482”, “483”, “484”, “485”, “486”, “487”, “488”, “489”, “490”, “491”, “492”, “493”, “494”, “495”, “496”, “497”, “498”, “499”, “500”, “501”, “502”, “503” and “504”.

47. Denies any knowledge or information sufficient to form a belief as to each and every allegation contained in paragraph “481” and all questions of law are reserved for the Court.

**STATUTES OF LIMITATIONS ARE TOLLED**

48. Denies each and every allegation contained in paragraphs “505”, “506”, “507”, “508”, “509”, “510”, “511”, “512”, “513”, “514”, “515”, “516”, “517”, “519”, “520”, “521” and “522”.

49. Denies any knowledge or information sufficient to form a belief as to each and every allegation contained in paragraph “518” and all questions of law are reserved for the Court.

**FIRST CAUSE OF ACTION  
COMMITTING AND ENABLING GENDER VIOLENCE**

50. Repeats and reiterates each admission or denial heretofore made in response to paragraph “523”.

51. Denies each and every allegation contained in paragraphs “524”, “525”, “526”, “527” and “528”.

**SECOND CAUSE OF ACTION  
COMMITTING AND ENABLING SEXUAL HARASSMENT, PREDATORY  
GROOMING, SEXUAL EXPLOITATION AND SEXUAL ABUSE**

52. Repeats and reiterates each admission or denial heretofore made in response to paragraph “529”.

53. Denies each and every allegation contained in paragraphs “530”, “531”, “532”, “533”, “534”, “535” and “536”.



**THIRD CAUSE OF ACTION**  
**COMMITTING AND ENABLING CRIMINAL and CIVIL SEXUAL BATTERY**

54. Repeats and reiterates each admission or denial heretofore made in response to paragraph "537".

55. Denies each and every allegation contained in paragraphs "538", "539", "540", "541", "542", "543", "544", "545" and "546".

**FIFTH CAUSE OF ACTION**  
**NEW YORK DECEPTIVE BUSINESS PRACTICES**  
**GENERAL BUSINESS LAW § 349-350**

56. Repeats and reiterates each admission or denial heretofore made in response to paragraph "547".

57. Denies each and every allegation contained in paragraphs "548", "549", "550", "551", "552", "553" and "554".

**SIXTH CAUSE OF ACTION**  
**COMMITTING AND ENABLING NEGLIGENT**  
**INFLICTION OF EMOTIONAL DISTRESS**

58. Repeats and reiterates each admission or denial heretofore made in response to paragraph "555".

59. Denies any knowledge or information sufficient to form a belief as to each and every allegation contained in paragraph "556" and all questions of law are reserved for the Court.

60. Denies each and every allegation contained in paragraphs "557", "558", "559", "560", "561" and "562".

**SEVENTH CAUSE OF ACTION**  
**COMMITTING AND ENABLING INTENTIONAL**  
**INFLICTION OF EMOTIONAL DISTRESS**

61. Repeats and reiterates each admission or denial heretofore made in response to paragraph "563".

62. Denies each and every allegation contained in paragraphs “564”, “565”, “566”, “567”, “568”, “569”, “570” and “571”.

**EIGHTH CAUSE OF ACTION**  
**CONSTRUCTIVE FRAUD**

63. Repeats and reiterates each admission or denial heretofore made in response to paragraph “572”.

64. Denies any knowledge or information sufficient to form a belief as to each and every allegation contained in paragraphs “573” and “574” and all questions of law are reserved for the Court.

65. Denies each and every allegation contained in paragraphs “575”, “576”, “577”, “578”, “579”, “580”, “581”, “582”, “583”, “584”, “585”, “586”, “587”, “588”, “589”, “590”, “591”, “592”, “593”, “594”, “595”, “596”, “597” and “598”.

**NINTH CAUSE OF ACTION**  
**COMMITTING AND ENABLING NEGLIGENCE**  
**AND PROFESSIONAL NEGLIGENCE**

66. Repeats and reiterates each admission or denial heretofore made in response to paragraph “599”.

67. Denies each and every allegation contained in paragraphs “600”, “603”, “604”, “605”, “606”, “607”, “608”, “609”, “610” and “611”.

68. Denies any knowledge or information sufficient to form a belief as to each and every allegation contained in paragraphs “601” and “602” and all questions of law are reserved for the Court.

**TENTH CAUSE OF ACTION**  
**NEGLIGENT SUPERVISION**

69. Repeats and reiterates each admission or denial heretofore made in response to paragraph “612”.

70. Denies any knowledge or information sufficient to form a belief as to each and every allegation contained in paragraphs “613” and “614” and all questions of law are reserved for the Court.

71. Denies each and every allegation contained in paragraphs “615”, “616”, “617”, “618”, “619”, “620”, “621”, “622”, “623” and “624”.

**ELEVENTH CAUSE OF ACTION**  
**NEGLIGENCE *PER SE* CONDUCT IN VIOLATION OF**  
**MANDATORY NEW YORK STATE REPORTING LAWS**

72. Repeats and reiterates each admission or denial heretofore made in response to paragraph “625”.

73. Denies each and every allegation contained in paragraphs “627”, “628”, “629”, “630”, “632”, “633”, “634”, “635”, “636”, “637” and “638”.

74. Denies any knowledge or information sufficient to form a belief as to each and every allegation contained in paragraphs “626” and 631”.

**TWELFTH CAUSE OF ACTION**  
**NEGLIGENT HIRING, RETENTION and RATIFICATION**

75. Repeats and reiterates each admission or denial heretofore made in response to paragraph “639”.

76. Denies each and every allegation contained in paragraphs “640”, “643”, “644”, “645”, “646”, “647”, “648”, “649”, “650”, “651”, “652”, “653”, “654”, “655”, “656”, “657”, “658”, “659”, “660”, “661” and “662”.

77. Denies any knowledge or information sufficient to form a belief as to each and every allegation contained in paragraphs “641” and “642”.

**THIRTEENTH CAUSE OF ACTION**  
**FAILURE TO WARN, TRAIN or EDUCATE**

78. Repeats and reiterates each admission or denial heretofore made in response to paragraph “663”.

79. Denies each and every allegation contained in paragraphs “664”, “665”, “666”, “667” and “668”.

**FOURTEENTH CAUSE OF ACTION**  
**GROSS NEGLIGENCE, WANTON, WILLFUL and RECKLESS CONDUCT**

80. Repeats and reiterates each admission or denial heretofore made in response to paragraph “669”.

81. Denies any knowledge or information sufficient to form a belief as to each and every allegation contained in paragraphs “670”, “671”, “672” and all questions of law are reserved for the Court.

82. Denies each and every allegation contained in paragraphs “673”, “674”, “675”, “676”, “677”, “678”, “679”, “680”, “681”, “682”, “683”, “684”, “685”, “686”, “687”, “688”, “689”, “690”, “691”, “692”, “693”, “694”, “695”, “696” and “697”.

**FIFTEENTH CAUSE OF ACTION**  
**INVASION OF PRIVACY UNDER NEW YORK MENTAL HEALTH LAW § 33.13**

83. Repeats and reiterates each admission or denial heretofore made in response to paragraph “698”.

84. Denies each and every allegation contained in paragraphs “699”, “700”, “701”, “702”, “703”, “704” and “705”.

**SIXTEENTH CAUSE OF ACTION**  
**DEFAMATION, LIBEL AND SLANDER**

85. Repeats and reiterates each admission or denial heretofore made in response to paragraph "706".

86. Denies any knowledge or information sufficient to form a belief as to each and every allegation contained in paragraphs "707", "708", "709", "710", "711", "712", "713", "714", "715" and "716".

87. Denies each and every allegation contained in paragraphs "717" and "718".

**SEVENTEENTH CAUSE OF ACTION**  
**REMOVAL OF SEXUAL PREDATOR ROBERT HADDEN'S NAME FROM THE**  
**BIRTH CERTIFICATES OF THE CHILDREN WHOSE MOTHERS WERE**  
**SEXUALLY ASSAULTED AND ABUSED**

88. Repeats and reiterates each admission or denial heretofore made in response to paragraph "719".

89. Denies each and every allegation contained in paragraphs "720", "721", "722", "723", "724", "726", "727", "728", "729", "733", "734", "735", "736" and "738".

90. Denies any knowledge or information sufficient to form a belief as to each and every allegation contained in paragraphs "725", "730", "731", "732" and "737".

**AS AND FOR A FIRST AFFIRMATIVE DEFENSE**

Upon information and belief, that any injury which plaintiffs may have sustained at the time and place set forth in the Complaint herein was caused wholly or in part, or was contributed to by the culpable conduct and negligence of said plaintiffs, and the amount of damages awarded herein, if any, should be denied or diminished in proportion to the amount of said culpable conduct and negligence of said plaintiffs.

**AS AND FOR A SECOND AFFIRMATIVE DEFENSE**

Upon information and belief, any past or future costs or expenses incurred or to be incurred by the plaintiffs for medical care, dental care, custodial care or rehabilitative services, loss of earnings or other economic loss has been or will with reasonable certainty, be paid or indemnified in whole or in part from collateral source as defined in Section 4545 of the New York Civil Practice law.

If any damages are recoverable against said defendant(s), the amount of such damages shall be diminished by the amount of the funds which plaintiffs has or shall receive from collateral source.

**AS AND FOR A THIRD AFFIRMATIVE DEFENSE**

If plaintiffs are entitled to recover damages for loss of earnings or impairment of earning ability as against defendant ROBERT HADDEN by reason of the matters alleged in the Complaint, liability for which is hereby denied, then pursuant to CPLR 4546 the amount of damages recoverable against said defendant, if any, shall be reduced by the amount of federal, state and local income taxes which the plaintiff would have been obligated by law to pay.

**AS AND FOR A FOURTH AFFIRMATIVE DEFENSE**

Any claim based upon lack of informed consent is barred by Public Health Law Section 2805-d.

**AS AND FOR A FIFTH AFFIRMATIVE DEFENSE**

That one or more causes of action herein may not be maintained (in whole or in part) by virtue of the applicable statutes of limitations.

**AS AND FOR A SIXTH AFFIRMATIVE DEFENSE**

That the Court lacks personal jurisdiction over the defendant, ROBERT HADDEN.

**AS AND FOR A SEVENTH AFFIRMATIVE DEFENSE**

Plaintiff has failed to file and or serve a proper certificate of Merit required by CPLR 3012-

a.

**AS AND FOR AN EIGHTH AFFIRMATIVE DEFENSE**

Plaintiff(s) right to recover damages, if any, are barred in whole or in part pursuant to the Patient Protection and Affordable Care Act, 26 USCS Section 500A.

**AS AND FOR A NINTH AFFIRMATIVE DEFENSE**

That the court lacks jurisdiction over this action in that it was previously removed to the United States District Court for the Southern District of New York.

**AS AND FOR A TENTH AFFIRMATIVE DEFENSE**

That service of the pleading in this action was not made until after expiration of the time permitted by the CPLR and that accordingly, plaintiffs are barred from a recovery herein.

**AS AND FOR AN ELEVENTH AFFIRMATIVE DEFENSE**

That the pleadings served (Supplemental Summons and Amended Verified Complaint), were not amended in a timely manner or by court order and that accordingly plaintiffs are barred from a recovery herein.

**PLEASE BE ADVISED**, any paragraph of plaintiffs' Complaint not answered is denied.

**WHEREFORE**, the defendant, **ROBERT HADDEN**, demands judgment dismissing the Complaint of the plaintiffs with the costs, interest and disbursements of this action.

Dated: Staten Island, New York  
July 3, 2019

VASLAS LEPOWSKY HAUSS & DANKE LLP  
Attorneys for Defendant  
ROBERT HADDEN  
201 Edward Curry Avenue, Suite 100  
Staten Island, NY 10314  
(718) 761-9300

By: 

KENNETH M. DALTON

TO: Anthony T. DiPietro, Esq.  
Law Office of Anthony T. DiPietro, P.C.  
*Attorney for Plaintiffs*  
233 Broadway, Suite 880  
New York, NY 10279

Jay A. Rappaport, Esq.  
Aaronson Rappaport Feinstein & Deutsch, LLP  
*Attorney for Defendants*  
COLUMBIA UNIVERSITY; THE NEW YORK AND PRESBYTERIAN  
HOSPITAL; COLUMBIA PRESBYTERIAN MEDICAL CENTER;  
COLUMBIA UNIVERSITY MEDICAL CENTER; COLUMBIA-PRESBYTERIAN  
MEDICAL CENTER, EAST SIDE ASSOCIATES; EAST SIDE ASSOCIATES; THE  
TRUSTEES OF COLUMBIA UNIVERSITY IN THE CITY OF NEW YORK;  
COLUMBIA UNIVERSITY COLLEGE OF PHYSICIANS AND SURGEONS;  
PRESBYTERIAN HOSPITAL PHYSICIAN SERVICES ORGANIZATION, INC.;  
COLUMBIA-CORNELL CARE, LLC; COLUMBIA CORNELL NETWORK  
PHYSICIANS, INC.; SLOANE HOSPITAL FOR WOMEN  
600 Third Avenue  
New York, NY 10016





**AFFIDAVIT OF SERVICE**

STATE OF NEW YORK     )  
                                  ) ss.:  
COUNTY OF RICHMOND    )

DEBORAH AGOSTINI, being duly sworn deposes and says: I am not a party to the action, am over 18 years of age and reside at Staten Island, New York.


On July 3, 2019, I served a true copy of the annexed **VERIFIED ANSWER TO THE AMENDED COMPLAINT** via e-filing through the NYSCEF website and by mailing the same in a sealed envelope, with postage prepaid thereon, in a post-office or official depository of the U.S. Postal Service within the State of New York, addressed to the last known address or the address(s) as indicated below:

Anthony T. DiPietro, Esq.  
Attorney for Plaintiffs  
The Woolworth Building  
233 Broadway – Suite 880  
New York, NY 10279

Jay A. Rappaport, Esq.  
Aaronson Rappaport Feinstein Deutsch, LLP  
Attorneys for Defendants  
The Trustees of Columbia University in the City of New York  
and The New York Presbyterian Hospital  
600 Third Avenue  
New York, NY 10016

  
DEBORAH AGOSTINI

Sworn to before me this  
3<sup>rd</sup> day of July 2019.

  
Notary Public

MARIA E. MERINGOLO  
NOTARY PUBLIC, STATE OF NEW YORK  
NO. 01ME6115852  
QUALIFIED IN RICHMOND COUNTY  
COMMISSION EXPIRES SEPT. 13, 2020